

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

7 WEST 57TH STREET REALTY COMPANY,  
LLC,

Plaintiff,

- against -

CITIGROUP, INC., CITIBANK, N.A., BANK  
OF AMERICA CORP., BANK OF AMERICA  
N.A., BARCLAYS BANK PLC, UBS AG,  
JPMORGAN CHASE & CO., JPMORGAN  
CHASE BANK, NATIONAL ASSOCIATION,  
CREDIT SUISSE GROUP AG, BANK OF  
TOKYO-MITSUBISHI UFJ LTD.,  
COÖPERATIEVE CENTRALE RAIFFEISEN-  
BOERENLEENBANK B.A., HSBC  
HOLDINGS PLC, HSBC BANK PLC, HBOS  
PLC, LLOYDS BANKING GROUP PLC,  
ROYAL BANK OF CANADA, THE  
NORINCHUKIN BANK, ROYAL BANK OF  
SCOTLAND GROUP, PLC, WESTLB AG,  
WESTDEUTSCHE IMMOBILIENBANK AG,  
DEUTSCHE BANK AG,

Defendants.

Case No. 1:13-cv-0981

**NOTICE OF FOREIGN BANK DEFENDANTS' MOTION TO DISMISS  
FOR LACK OF PERSONAL JURISDICTION**

PLEASE TAKE NOTICE that the undersigned, attorneys for defendants The Bank of Tokyo-Mitsubishi UFJ, Ltd., Barclays Bank PLC, Coöperatieve Centrale Raiffeisen-Boerenleenbank B.A., Credit Suisse Group AG, Deutsche Bank AG, HSBC Holdings plc, HSBC Bank plc, Lloyds Banking Group plc, HBOS plc, The Norinchukin Bank, The Royal Bank of Canada, The Royal Bank of Scotland Group plc, Portigon AG (f/k/a WestLB AG), and Westdeutsche ImmobilienBank AG, upon the declarations submitted concurrently

herewith, and for the reasons set forth in the Memorandum of Law and Schedule A thereto, defendants, by and through their undersigned attorneys, will move this Court before the Honorable Paul G. Gardephe, United States District Judge for the Southern District of New York, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by this Court, for an order pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure dismissing with prejudice the First Amended Complaint in the above-captioned action. By order of this Court on October 29, 2014, Plaintiff is to serve any papers in opposition to this motion by December 3, 2014 and Defendants are to file any reply papers in further support of this motion by December 10, 2014.

Dated:           New York, New York  
November 14, 2014

/s/ Daryl A. Libow

Daryl A. Libow  
Christopher M. Viapiano  
SULLIVAN & CROMWELL LLP  
1700 New York Avenue, N.W., Suite 700  
Washington, D.C. 20006  
libowd@sullcrom.com  
viapianoc@sullcrom.com  
Telephone: (202) 956-7500  
Fax: (202) 956-7056

*Attorneys for Defendant The Bank of Tokyo-  
Mitsubishi UFJ, Ltd.*

/s/ Jeffrey T. Scott

David H. Braff  
Yvonne S. Quinn  
Jeffrey T. Scott  
Matthew J. Porpora  
SULLIVAN & CROMWELL LLP  
125 Broad Street  
New York, New York 10004  
Telephone: (212) 558-4000  
braffd@sullcrom.com  
quinny@sullcrom.com  
scottj@sullcrom.com  
porporam@sullcrom.com  
*Attorneys for Defendant Barclays PLC*

/s/ David R. Gelfand

David R. Gelfand  
Sean M. Murphy  
MILBANK TWEED HADLEY & McCLOY  
LLP  
One Chase Manhattan Plaza  
New York, New York 10005  
dgelfand@milbank.com  
smurphy@milbank.com  
Telephone: (212) 530-5000

*Attorneys for Defendant Coöperatieve Centra-  
le Raiffeisen-Boerenleenbank B.A.*

/s/ Herbert S. Washer

Herbert S. Washer

Elai Katz

Joel Kurtzberg

CAHILL GORDON & REINDEL LLP

80 Pine Street

New York, New York 10005

Telephone: (212) 701-3000

hwasher@cahill.com

ekatz@cahill.com

jkurtzberg@cahill.com

*Attorneys for Defendant Credit Suisse Group  
AG*

/s/ Moses Silverman

Moses Silverman

Andrew C. Finch

Ankush Khardori

PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP

1285 Avenue of the Americas

New York, New York 10019-6064

Telephone: (212) 373-3355

msilverman@paulweiss.com

afinch@paulweiss.com

akhardori@paulweiss.com

*Attorneys for Defendant Deutsche Bank AG*

/s/ Ed DeYoung

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Ed DeYoung  
Roger B. Cowie  
LOCKE LORD LLP  
2200 Ross Avenue, Suite 2200  
Dallas, Texas 75201  
Telephone: (214) 740-8614  
Fax: (214) 740-8800  
edeyoung@lockelord.com  
rcowie@lockelord.com

Gregory T. Casamento  
LOCKE LORD LLP  
3 World Financial Center  
New York, New York 10281  
Telephone: (212) 812-8325  
Fax: (212) 812-8385  
gcasamento@lockelord.com

*Attorneys for Defendant HSBC Holdings plc  
and HSBC Bank plc*

/s/ Marc J. Gottridge

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Marc J. Gottridge  
Lisa J. Fried  
HOGAN LOVELLS US LLP  
875 Third Avenue  
New York, New York 10022  
marc.gottridge@hoganlovells.com  
lisa.fried@hoganlovells.com  
Telephone: (212) 918-3000  
Fax: (212) 918-3100

*Attorneys for Defendants HBOS plc and Lloyds  
Banking Group plc*

/s/ Andrew W. Stern

Andrew W. Stern  
Alan M. Unger  
Nicholas P. Crowell  
SIDLEY AUSTIN LLP  
787 Seventh Avenue  
New York, New York 10019  
astern@sidley.com  
aunger@sidley.com  
ncrowell@sidley.com  
Telephone: (212) 839-5300  
Fax: (212) 839-5599

*Attorneys for Defendant The Norinchukin Bank*

/s/ Arthur W. Hahn

Arthur W. Hahn  
Christian T. Kemnitz  
KATTEN MUCHIN ROSENMAN LLP  
525 West Monroe Street  
Chicago, Illinois 60661  
arthur.hahn@kattenlaw.com  
christian.kemnitz@kattenlaw.com  
Telephone: (312) 902-5200

*Attorneys for Defendant Royal Bank of Canada*

/s/ Fraser L. Hunter, Jr.

Fraser L. Hunter, Jr.  
David S. Lesser  
Alan E. Schoenfeld  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
250 Greenwich Street  
New York, New York 10007  
Telephone: (212) 230-8800  
Fax: (212) 230-8888  
fraser.hunter@wilmerhale.com  
david.lesser@wilmerhale.com  
alan.schoenfeld@wilmerhale.com

/s/ Robert G. Houck

Robert G. Houck  
Alejandra de Urioste  
James D. Miller  
CLIFFORD CHANCE US LLP  
31 West 52nd Street  
New York, New York 10019  
robert.houck@cliffordchance.com  
alejandra.deurioste@cliffordchance.com  
jim.miller@cliffordchance.com  
Telephone: (212) 878-8000

*Attorneys for Defendant The Royal Bank of  
Scotland Group plc*

/s/ Christopher M. Paparella

Christopher M. Paparella  
Ethan E. Litwin  
Morgan J. Feder  
HUGHES HUBBARD & REED LLP  
One Battery Park Plaza  
New York, New York 10004  
Telephone: (212) 837-6000  
Fax: (212) 422-4726  
Chris.Paparella@hugheshubbard.com  
Ethan.Litwin@hugheshubbard.com  
Marc.Weinstein@hugheshubbard.com  
Morgan.Feder@hugheshubbard.com

*Attorneys for Defendants Portigon AG (f/k/a  
WestLB AG) and Westdeutsche Immobilien-  
Bank AG*